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28 **IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

DANIEL ROSENBAUM; RENELDO  
RODRIGUEZ; and THOMAS CARON,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

v.

PERMIAN RESOURCES CORP. f/k/a  
CENTENNIAL RESOURCE  
DEVELOPMENT, INC.; CHESAPEAKE  
ENERGY CORPORATION;  
CONTINENTAL RESOURCES INC.;  
DIAMONDBACK ENERGY, INC.; EOG  
RESOURCES, INC.; HESS  
CORPORATION; OCCIDENTAL  
PETROLEUM CORPORATION; and  
PIONEER NATURAL RESOURCES  
COMPANY,

Defendants.

CASE NO. 2:24-cv-00103-GMN-MDC

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANTS TO  
RESPOND TO THE COMPLAINT  
(FIRST REQUEST)**

1 IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Daniel Rosenbaum,  
 2 Reneldo Rodriguez, and Thomas Caron (together, “Plaintiffs”) and all Defendants in this action,  
 3 Permian Resources Corp. f/k/a Centennial Resource Development, Inc., Chesapeake Energy  
 4 Corporation, Continental Resources Inc., Diamondback Energy, Inc., EOG Resources, Inc., Hess  
 5 Corporation, Occidental Petroleum Corporation, Pioneer Natural Resources Company (together,  
 6 “Defendants”)<sup>1</sup>, by and through their respective counsel and pending the Court’s approval, that  
 7 Defendants shall have an additional 60 days to answer or otherwise respond to the Complaint (ECF  
 8 No. 1). Defendants’ original response deadline is February 7, 2024. With an additional 60 days,  
 9 Defendants’ deadline to answer or otherwise respond to the Complaint is extended to April 8,  
 10 2024.

11 Good cause exists for the extension set forth herein.

12 *First*, eight defendants have been named in this action. Defense counsel were only recently  
 13 retained, and they require additional time to organize themselves, meet and confer with plaintiffs,  
 14 and streamline any potential motions that may be presented to the Court.

15 *Second*, three additional, related actions have been filed against Defendants in this  
 16 District.<sup>2</sup> Additional time is warranted so that the parties and the Court may determine whether  
 17 and which of the other actions filed against Defendants in this District should be coordinated with  
 18 this action.

19 *Third*, the interests of efficiency would be served by allowing the parties sufficient time to  
 20 meet and confer on a reasonable approach and briefing schedule for any motions to be presented

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22 <sup>1</sup> By entering into this stipulation, none of the Defendants are waiving any of their potential  
 23 defenses or arguments to this action, including but not limited to those related to personal  
 jurisdiction and venue.

24 <sup>2</sup> On January 22, 2024, a complaint was filed against Defendants in *Andrew Caplen Installations*  
 25 *LLC et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00150-JCM-DJA; on January 24, 2024,  
 26 a complaint was filed against Defendants in *These Paws Were Made for Walkin’ LLC v. Permian*  
*Resources Corp. et al.*, No. 2:24-cv-00164-GMN-NJK; and on January 29, 2024, a complaint was  
 27 filed against Defendants in *Courtmanche et al. v Permian Resources Corp. et al.*, No. 2:24-cv-  
 00198. Two notices of related cases have been filed in the instant action (ECF Nos. 20, 23), and  
 28 a notice of related cases in each: *Andrew Caplen Installations* (ECF No. 10), *These Paws Were*  
*Made for Walkin’* (ECF No. 5), and *Courtmanche* (ECF No. 10). The parties have indicated they  
 would be amenable to proceeding on this schedule in the event the cases are coordinated for pretrial  
 proceedings.

1 to the Court in these actions, with the goal of minimizing the number of filings and avoiding  
2 duplication.

3 This is the first extension requested for Defendants to respond to the Complaint and is not  
4 made for the purpose of delay.

5 Dated: January 31, 2024

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14 Dated: January 31, 2024

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19 Dated: January 31, 2024

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11 IT IS SO ORDERED:  
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15 Maximiliano D. Couvillier III  
16 United States Magistrate Judge  
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20 Dated: 2-1-2024  
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